

**TRIAL on**

**#1 Complaint Requesting Declaratory Judgment filed by Krisjenn Ranch, LLC, Krisjenn Ranch, LLC, Series Uvalde Ranch, Krisjenn Ranch, LLC, Series Pipeline Row (attorneys Charles John Muller IV, Ronald J. Smeberg) against DMA Properties, Inc., Longbranch Energy, LP**

**EXHIBIT AND WITNESS LIST**

AO 187 (REV. 4/82)

<b>Krisjenn Ranch LLC. vs. DMA Properties, et.al.</b>					DISTRICT COURT Western District San Antonio Division
<b>PLAINTIFF'S ATTORNEY</b>  Charles Muller		<b>DEFENDANT'S ATTORNEY</b>  Tim Cleveland		<b>DOCKET NUMBER</b> 20-5027K (BK 20-50805)  <b>TRIAL DATE(S)</b> 01-11-21: 1-12-21: 1-13-21: 1-15-21: 1-21-21 AND 02-11-21	
<b>PRESIDING JUDGE</b>  RONALD B. KING		<b>ELECTRONIC COURT RECORDING OPERATOR</b> Rosa Gonzalez, Terrance Kanyumbu, Emilio Luna, Rosa Gonzalez, Maria Esquivel & Maria Esquivel		<b>COURTROOM DEPUTY</b>  Deanna Castleberry  <div style="font-size: 2em; font-weight: bold; text-align: center;">FILED</div>	
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS * AND WITNESSES <div style="text-align: right;">FEB 11 2021</div> <div style="text-align: right;">U.S. BANKRUPTCY COURT BY <i>DMC</i> DEPUTY</div>
					<b>DMA Properties, Inc. Longbranch Energy TRCG East Texas Witness &amp; Exhibits</b>
	1-78	1-11-21	XXXX	1-11-21	SEE ATTACHED Binder (List of Exhibits)
					<b>Krisjenn Ranch, LLC. et.al. Witness &amp; Exhibits</b>
1-104		1-11-21	XXXX	1-11-21	SEE ATTACHED 3 Binder's (List of Exhibits)
W/1		1-11-21	-----	-----	<b>Larry Wright</b>
W/2		1-12-21	-----	-----	<b>Larry Wright</b>
W/3		1-12-21	-----	-----	<b>Craig Crockett</b>

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<i>In re:</i>	§	
	§	CHAPTER 11
KrisJenn Ranch, LLC,	§	
	§	
<i>Debtor</i>	§	CASE No. 20-50805
	§	
	§	

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KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline ROW, as successors in interest to Black Duck Properties, LLC,	§	
	§	
	§	
	§	
	§	
<i>Plaintiffs,</i>	§	ADVERSARY No. 20-05027
	§	
v.	§	
	§	
DMA Properties, Inc., Frank Daniel Moore, and Longbranch Energy, LP,	§	
	§	
<i>Defendants.</i>	§	

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DMA Properties, Inc., Frank Daniel Moore, and Longbranch Energy, LP,	§	
	§	
	§	
<i>Counterplaintiffs,</i>	§	
	§	
v.	§	
	§	
KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline ROW, Black Duck Properties, LLC, Larry Wright,	§	ADVERSARY No. 20-05027
	§	
<i>Counterdefendants.</i>	§	
	§	
	§	

**AMENDED EXHIBIT LIST  
FOR LONGBRANCH, DMA, AND MOORE**

Longbranch Energy, DMA Properties, and Frank Daniel Moore hereby submit their amended exhibit list for trial.

PX	DX	Marked	Obj.	Admit	Description
	1	1/11/21		1/11/21	Longbranch Assignment
	2				DMA Agreement
	3				Email Agreement
	4				Harris SWD Agreement
	5				Black Duck Company Agreement
	6				Purchase & Sale Agreement between Express and Longbranch
	7				Bigfoot Promissory Note
	8				Assignment of Note from Black Duck to KrisJenn
	9				Deed Conveying Express Pipeline from Express to Black Duck
	10				KrisJenn Deed of Trust (Renewal and Modification of KrisJenn Note Held by Asilo)
	11				Deed of Trust (KrisJenn Loan to Black Duck)
	12				Solaris Offer Letter
	13				SCMED Assignments
	14				Terrill Affidavit
	15				TCRG LLC Agreement
	16				TCRG Purchase Agreement
	17				TCRG Deed (Conveyance from Black Duck to TCRG)
	18				TCRG Reconveyance to KrisJenn Ranch, LLC-Series Pipeline ROW
	19				TCRG Compromise Settlement Agreement
	20				Release of Lien (filed by KrisJenn in Rusk County on June 28, 2019)
	21				Letter from KrisJenn to Bigfoot re: Assignment and Foreclosure (Oct. 12, 2018)
	22				Letter of Intent re: Terrill Purchase of ROW from Black Duck (Feb. 9, 2018)
	23				Certificate of Termination for Black Duck, LLC
	24				Extension of Closing Date
	25				Option Agreement with McLeod Oil, LLC (Dec. 20, 2019)
	26				Note Between Black Duck and KrisJenn (Aug. 14, 2017)
	27				Deed of Trust re: Loan from KrisJenn to Black Duck (executed January 18, 2018)

28	1/11/21	1/11/21	Email re: Formation of Black Duck (Dec. 2, 2015)
29			Email re: SCMED (Feb. 19, 2016)
30			Email re: Formation of Black Duck (March 10, 2016)
31			Email from Moore to Wright (Feb. 21, 2017)
32			Email from Wright (Feb. 21, 2017)
33			Email re: Extension of Closing Date (July 13, 2017)
34			Email re: Moore Authorization for Extension (July 17, 2017)
35			Email re: Limits of Moore Authorization (July 17, 2017)
36			Email re: Wright Funding for ROW (Jan. 31, 2018)
37			Email re: Net Profits Hypothetical (Feb. 7, 2018)
38			Email from Moore to Terrill (April 9, 2018)
39			Email from Borders to Terrill, Wright, and Moore (April 9, 2018)
40			Email from Moore to Wright and Borders (April 9, 2018)
41			Email from Wright to Borders re: TCRG Sale Terms (April 10, 2018)
42			Emails between Wright, Moore, and Strolle re: TCRG Sale (April 9-11, 2018)
43			Emails between Wright and Moore re: Harris SWD Payments (Oct. 22 - Nov. 6, 2018)
44			Emails between Wright and Moore re: IRS Audit (Nov. 8, 2018)
45			Email from Wright Threatening to "Kill" DMA and Longbranch's Interests (April 16, 2019)
46			Minutes of Black Duck Special Meeting (Aug. 14, 2017)
47			Minutes of Black Duck Special Meeting (Nov. 14, 2018)
48			Email from Strolle to Larry re: Longbranch Interest (April 4, 2019)
49			Initial Bankruptcy Schedule for KrisJenn Ranch, LLC
50			Emails between Wright and Strolle re: McLeod Loan Modification (Dec. 13, 2019)
51			Emails between Wright and McLeod re: Handshake Deal (July 15, 2020)
52			Email from Wright (Sept. 16, 2020)
53			Email from Wright to McLeod (April 14, 2020)
54			McLeod Notice of Event of Default
55			Asilo Master Statement
56			Wright Notes re: Loan vs. Capital Contribution
57			Black Duck Consent (July 13, 2017)
58			Notice of Default from Wright to Himself (Sept. 27, 2018)

59	1/11/21		1/11/21	Wright Tabulations re: Harris SWD
60				TCRG Business Affidavit
61				TCRG 0001-0012
62				Texts between Wright and Borders
63				Email on or about May 13, 2016 where Moore and Wright set out terms of 20/20/60
64				Letter from Strolle re: Wright sale of points on the waterline to fund debt
65				Joint Venture Documents and Email(s)
66				Certified Balance of Funds in Panola County Court
67				Strolle Email re: Borders and ROW Project Interference
68				Right-of-Way Marker
69				Emails between Wright, Moore, and Borders re: ROW Status
70				Wright Email to Borders on April 4, 2019
71				Minutes of Black Duck Special Meeting (Jan. 18, 2016)
72				Emails between Moore, Borders, and Wright (Feb. 8-9, 2018)
73				Emails between Moore and Wright (April 13, 2019)
74				Pipeline Maps
75				Pipeline Image
76				McLeod Business Records Affidavit
77				Email from Strolle to Wright (Feb. 6, 2018)
78				Email from Strolle to Wright (March 7, 2018)

Respectfully submitted,

/s/ Christopher S. Johns

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the “Debtors”), and Larry Wright, individually, and submit the following list of exhibits to be offered and witnesses who may or will be called to testify at the January 11, 2021, trial on the merits:

EXHIBIT NO.	DESCRIPTION OF EXHIBIT	OFFERED	ACCEPTED	REJECTED
1	Email August 5, 2016 with attached Memo July 14, 2010	7/11/21	7/11/21	
2	Email FW on January 10, 2019 referring to Email July 20, 2014			
3	Email December 2, 2015 Subject: Business Formation			
4	Email FW on January 10, 2019 referring to Email February 5, 2016			
5	Black Duck Company Agreement			
6	Email February 19, 2016			
7	Email May 13, 2016 through June 3, 2016			
8	Email March 31, 2016			
9	Email April 17, 2016			
10	Email May 13, 2016			
11	Email June 8, 2016			

12	Email June 8, 2016 through June 9, 2016	1/11/21	1/11/21	
13	Agreement for Assignment			
14	Email July 15, 2016			
15	Email September 20, 2016			
16	Email September 28, 2016			
17	Email October 13, 2016			
18	Email November 8, 2016			
19	Receipt of Payment			
20	Email February 21, 2017			
21	Email February 21, 2017			
22	Email March 2, 2017			
23	Promissory Note			
24	Email FW on January 10, 2019 referring to Email April 25, 2017			
25	Email April 8, 2017			

26	Email April 17, 2017	1/11/21	1/11/21	
27	Email April 24, 2017			
28	Email FW on January 10, 2019 referring to Email May 25, 2017			
29	Email May 31, 2017			
30	Email FW on January 10, 2019 referring to Email June 30, 2017			
31	Consent of Members July 13, 2017			
32	Extension of Closing Date July 14, 2017			
33	Email July 17, 2017			
34	Email August 3, 2017			
35	Email October 9, 2017			
36	Deed, Conveyance and Assignment August 11, 2017			
37	Real Estate Lien Note Asilo August 14, 2017			
38	Real Estate Lien Notes August 14, 2017			
39	Email April 9, 2018 with attachment Recorded Longbranch Assignment dated October 2, 2017			

40	Email January 9, 2018	1/11/21	1/11/21	
41	**** Electronically Filed Document**** Deed of Trust for Loan to KrisJenn			
42	Email FW on January 10, 2019 referring to Email January 17, 2018			
43	Email January 31, 2018			
44	Email February 1, 2018			
45	Email FW on January 10, 2019 referring to Email February 2, 2018			
46	Email February 2, 2018			
47	Email February 3, 2018			
48	Email February 3, 2018			
49	Email February 3, 2018			
50	Email February 5, 2018			
51	00193765 VOL: 3610 PG:414 Agreement			
52	Email February 7, 2018			
53	Email February 7, 2018			

54	Email February 8, 2018 through April 9, 2018	1/11/21	1/11/21	
55	Email FW on December 4, 2020 referring to Email February 8-9, 2018			
56	TCRG Company Agreement			
57	Email February 20, 2018			
58	Harris SWD Agreement			
59	Email March 20, 2018			
60	Assignment and Resignation Agreement			
61	Deed, Conveyance, Assignment and Bill of Sale			
62	Email FW on January 10, 2019 referring to Email April 9-11, 2018			
63	Email April 9, 2018 with Attachment			
64	Email April 9, 2018 with Attachment			
65	Email April 9, 2018 with Attachment			
66	Email April 9-11, 2018			
67	Email April 10, 2018			

68	Email April 10 through July 24, 2018	1/11/21	1/11/21	
69	Email April 11, 2018			
70	Email FW on December 7, 2020 referring to Email April 10 through July 24, 2018			
71	Instrument Number: 2018-4273			
72	Guaranty of Debt			
73	Notice of Default			
74	Letter October 12, 2018			
75	Email November 7, 2018			
76	Email December 19, 2018			
77	Letter December 21, 2018			
78	Email FW on December 7, 2020 referring to Email July 24, 2018			
79	Intentionally left blank.			
80	Email FW on December 7, 2020 referring to Emails December 19, 2018 and April 4, 2019			
81	Email January 31, 2019			

82	Email February 1, 2019	1/11/21	1/11/21	
83	Term Note			
84	Loan Agreement			
85	Release of Lien			
86	Email February 19, 2019			
87	Letter February 26, 2019			
88	Letter March 5, 2019			
89	Email FW on December 7, 2020 referring to Email April 3, 2019			
90	Email April 5, 2019			
91	Email April 13, 2019			
92	Email April 16, 2019			
93	Email April 23, 2019			
94	Email May 3, 2019			
95	Email May 21, 2019			



96	Email May 31, 2019	1/11/21	1/11/21	
97	Compromise Settlement Agreement			
98	Johns&Counsel Supplement to Engagement Agreement and Contract for Contingent Fee			
99	Email September 16, 2020			
100	Text messages produced by Longbranch Energy, LP,			
101	Text messages produced by Longbranch Energy, LP,			
102	Tax Forfeiture January 29, 2016			
103	Email February 20, 2018			
104	December 19, 2018 Certificate of Termination.			

Debtors and Wright reserve the right to request admission of exhibits designated by any other party.

Witnesses who may be called to testify are as follows:

1. Larry Wright  
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Debtors and Wright reserve the right to call rebuttal witnesses and any witness designated by another party.

Dated: January 8, 2021.

Respectfully submitted,

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